

**Air Pollution Control District
Jefferson County, Ky
13 December 1999**

TITLE V PERMIT SUMMARY

Company: CONCO, Inc, 4000 Oaklawn Drive, Louisville, Kentucky 40219-2796

Date App. Received: 15 December 1994

Date Admin. Complete: 17 May 1995

Date of Draft Permit: 17 October 1999

Date of Proposed Permit: 17 October 1999

District Engineer: Darrell T. Poff

SIC: 3411

EIS#: 0047

NAICS#: 332431

Permit#: 88-97-TV

Introduction:

This permit will be issued pursuant to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements applicable to CONCO and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), PM, PM₁₀, and lead (Pb); unclassifiable for PM_{2.5}; and is a moderate non-attainment area for ozone (O₃).

CONCO manufactures and refurbishes steel ammunition cans and boxes according to U.S. Military specifications.

Application Type/Permit Activity:

- ☒ Initial Issuance
- ☐ Permit Revision
 - ☐ Administrative
 - ☐ Minor
 - ☐ Significant
- ☐ Permit Renewal

Compliance Summary:

- ☒ Compliance certification signed
- ☐ Compliance schedule included

[] Source is out of compliance

I. SOURCE DESCRIPTION

1. **Class I Area Impacts:** This source is not located in or near a Class I area.
2. **Product Description:** CONCO manufactures and refurbishes steel ammunition cans and boxes according to U.S. Military specifications under SIC code 3411.
3. **Overall Source Process Description:** Welded sheet metal ammunition cans are cleaned, coated with zinc phosphate, dried, spray painted, and then baked.
4. **Site Determination:** There are no other facilities which are contiguous or adjacent and under common control.
5. **Emission Unit Summary**

North Paint System (U1): Welded sheet metal cans are spray washer cleaned, zinc phosphate coated, dried, spray painted, and oven baked. Washer, spray booths, and ovens are vented through stacks to atmosphere with particulate filters.

South Paint System (U2): Same as for North Paint System.

6. **Fugitive Sources:** None of significance.
7. **Title V Major Source Status by Pollutant**

Pollutant	Actual Emissions (tpy) - 1998 Data	Major Source Status (Based on PTE)
NO _x	1.27	No
SO ₂	0.08	No
PM	0.12	No
VOC	24.58	Yes
Single HAP (> 1 tpy)		
Benzene	2.14	No
Glycol Ethers	8.27	Yes
Xylenes	8.73	Yes
Total HAPs	19.89	Yes

8. **MACT Standards:** None.
9. **Applicable Requirements**

☐ PSD ☐ NSPS ☒ SIP ☐ NSR ☐ NESHAPS
☒ District-Origin ☐ Other

II. Regulatory Analysis

1. **Emission and Operating Caps:** CONCO is not subject to any plant-wide emission or operating caps.
2. **Compliance Status:** The source signed and submitted a Title V compliance certification in its permit application.
3. **Operational Flexibility:** The source did not request to operate under any alternative operating scenarios in its Title V Permit Application.
4. **Testing Requirements:** None.
5. **Monitoring, Recordkeeping and Reporting Requirements:** The source is required to monitor, maintain records of, and report on various operating parameters to demonstrate ongoing compliance with all applicable requirements. Additionally, periodic monitoring of PM emissions is not required as combined potential, uncontrolled emissions from U1 and U2 are 0.33 tpy, corresponding to an hourly rate of 0.08 pounds, which is below the allowable emission rate of District Regulation 7.08. Continued compliance will be tracked using annual emissions inventory reporting.
6. **Off-Permit Documents:** None.

The District considers an “off-permit document” as a document on which a source’s compliance with given regulation(s) is contingent or which contains regulatory requirement(s), but is only referenced in a source’s Title V Operating Permit. The designation “off-permit document” shall be made at the District’s discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, PMPs, MOCS; or other documents which are too voluminous to be included in a source’s Title V Operating Permit, as determined by the District.

III. Other Requirements:

1. **Temporary Sources:** The source did not request to operate any temporary sources.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Compliance Schedule/Progress Reports:** The source is in compliance with all applicable requirements, therefore, no compliance schedule or progress reports are necessary.
4. **Emissions Trading:** The source does not participate in emissions trading.
5. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.

6. **Stratospheric Ozone Protection Requirements:** The source does not manufacture, sell, distribute, or otherwise use any of the chemicals listed under Title VI of the CAAA.
7. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR 68 Subpart F and District Regulation 5.15 (Chemical Accident Prevention Provisions) in a quantity in excess of the corresponding specified threshold amount.
8. **Insignificant Activities:** The following activities, as referenced in CONCO's Title V Permit Application, have been determined by the District to be insignificant.

INSIGNIFICANT ACTIVITIES		
Description	Quantity	Basis
Pyrolysis Oven	1	Emissions negligible as determined from manufacturer's specifications*
Boilers/Space Heaters	32	Exempt, Regulation 2.02, section 2.1
Laboratory Oven	1	Emissions negligible
Non-halogenated Cold Solvent Parts Cleaners, equipped with secondary reservoirs	4	Exempt, Regulation 2.02, section 2.3.22

*And as determined from documented emission levels. For any given regulated pollutant, the *potential to emit* is not above 0.7 tons per year, with nitrogen oxides being the highest.